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 10 **IN THE UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 IN RE: UBER TECHNOLOGIES,
 13 INC., PASSENGER SEXUAL
 ASSAULT LITIGATION

14 This Document Relates to:

15 *Jane Roe CL 16 v. Uber Technologies,*
 16 *Inc., et al., No. 3:24-cv-04837-CRB*

17 *Jane Roe CL 24 v. Uber Technologies,*
 18 *Inc., et al., No. 3:24-cv- 05536-CRB*

19 *Jane Roe CL 34 v. Uber Technologies,*
 20 *Inc., et al., No. 3:24-cv- 05696-CRB*

21 *Jane Roe CL 36 v. Uber Technologies,*
 22 *Inc., et al., No. 3:24-cv- 05720-CRB*

23 *Jane Roe CL 37 v. Uber Technologies,*
 24 *Inc., et al., No. 3:24-cv- 05728-CRB*

25 *Jane Roe CL 38 v. Uber Technologies,*
 26 *Inc., et al., No. 3:24-cv- 05729-CRB*

27 *Jane Roe CL 42 v. Uber Technologies,*
 28 *Inc., et al., No. 3:24-cv- 05740-CRB*

Jane Roe CL 43 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 05741-CRB

Jane Roe CL 48 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 05810-CRB

Case No.: 3:23-md-03084-CRB

Hon. Charles R. Breyer

**PLAINTIFFS' MEMORANDUM
 IN SUPPORT OF OPPOSITION
 TO DEFENDANTS' MOTION TO
 DISMISS CASES FOR FAILURE
 TO COMPLY WITH COURT
 ORDER**

Date: August 22, 2025
 Time: 10:00 a.m.
 Courtroom: 6 – 17th Floor

1 *Jane Roe CL 53 v. Uber Technologies,
2 Inc., et al., No. 3:24-cv- 05831-CRB*

3 *Jane Roe CL 56 v. Uber Technologies,
4 Inc., et al., No. 3:24-cv- 05837-CRB*

5 *Jane Roe CL 65 v. Uber Technologies,
6 Inc., et al., No. 3:24-cv- 06189-CRB*

7 *Jane Roe CL 70 v. Uber Technologies,
8 Inc., et al., No. 3:24-cv- 06863-CRB*

9 *Jane Roe CL 71 v. Uber Technologies,
10 Inc., et al., No. 3:24-cv- 06864-CRB*

11 *Jane Roe CL 76 v. Uber Technologies,
12 Inc., et al., No. 3:24-cv- 07569-CRB*

13 *Jane Roe CL 77 v. Uber Technologies,
14 Inc., et al., No. 3:24-cv- 07571-CRB*

15 *Jane Roe CL 78 v. Uber Technologies,
16 Inc., et al., No. 3:24-cv- 07584-CRB*

17 *Jane Roe CL 79 v. Uber Technologies,
18 Inc., et al., No. 3:24-cv- 07857-CRB*

19 *Jane Roe CL 81 v. Uber Technologies,
20 Inc., et al., No. 3:24-cv- 08521-CRB*

21 *Jane Roe CL 83 v. Uber Technologies,
22 Inc., et al., No. 3:24-cv- 08525-CRB*

23 *Jane Roe CL 84 v. Uber Technologies,
24 Inc., et al., No. 3:24-cv- 08526-CRB*

25 *Jane Roe CL 85 v. Uber Technologies,
26 Inc., et al., No. 3:24-cv- 08754-CRB*

27 *Jane Roe CL 86 v. Uber Technologies,
28 Inc., et al., No. 3:24-cv- 08756-CRB*

29 *Jane Roe CL 88 v. Uber Technologies,
30 Inc., et al., No. 3:24-cv- 09145-CRB*

31 *Jane Roe CL 91 v. Uber Technologies,
32 Inc., et al., No. 3:24-cv- 09235-CRB*

33 *Jane Roe CL 92 v. Uber Technologies,
34 Inc., et al., No. 3:24-cv- 09237-CRB*

35 *Jane Roe CL 93 v. Uber Technologies,
36 Inc., et al., No. 3:24-cv- 09549-CRB*

1 *Jane Roe CL 98 v. Uber Technologies,
2 Inc., et al., No. 3:25-cv- 00853-CRB*

3 *Jane Roe CL 101 v. Uber Technologies,
4 Inc., et al., No. 3:25-cv- 01118-CRB*

5 *Jane Roe CL 102 v. Uber Technologies,
6 Inc., et al., No. 3:25-cv- 01120-CRB*

7 *Jane Roe CL 103 v. Uber Technologies,
8 Inc., et al., No. 3:25-cv- 01347-CRB*

9 *Jane Roe CL 105 v. Uber Technologies,
10 Inc., et al., No. 3:25-cv- 01349-CRB*

11 *Jane Roe CL 107 v. Uber Technologies,
12 Inc., et al., No. 3:25-cv- 01470-CRB*

13 *Jane Roe CL 109 v. Uber Technologies,
14 Inc., et al., No. 3:25-cv- 01652-CRB*

15 *Jane Roe CL 110 v. Uber Technologies,
16 Inc., et al., No. 3:25-cv- 01653-CRB*

17 *Jane Roe CL 114 v. Uber Technologies,
18 Inc., et al., No. 3:25-cv- 01942-CRB*

19 *Jane Roe CL 118 v. Uber Technologies,
20 Inc., et al., No. 3:25-cv- 02132-CRB*

21 *Jane Roe CL 119 v. Uber Technologies,
22 Inc., et al., No. 3:25-cv- 02133-CRB*

23 *Jane Roe CL 122 v. Uber Technologies,
24 Inc., et al., No. 3:25-cv- 02138-CRB*

25 *Jane Roe CL 126 v. Uber Technologies,
26 Inc., et al., No. 3:25-cv- 02495-CRB*

27 *Jane Roe CL 127 v. Uber Technologies,
28 Inc., et al., No. 3:25-cv- 02496-CRB*

29 *Jane Roe CL 130 v. Uber Technologies,
30 Inc., et al., No. 3:25-cv- 02742-CRB*

31 *Jane Roe CL 131 v. Uber Technologies,
32 Inc., et al., No. 3:25-cv- 02743-CRB*

33 *Jane Roe CL 135 v. Uber Technologies,
34 Inc., et al., No. 3:25-cv- 02747-CRB*

35 *Jane Roe CL 137 v. Uber Technologies,
36 Inc., et al., No. 3:25-cv- 03036-CRB*

1 *Jane Roe CL 138 v. Uber Technologies,*
2 *Inc., et al., No. 3:25-cv- 03137-CRB*

3 *Jane Roe CL 139 v. Uber Technologies,*
4 *Inc., et al., No. 3:25-cv- 03255-CRB*

5 *Jane Roe CL 142 v. Uber Technologies,*
6 *Inc., et al., No. 3:25-cv- 03258-CRB*

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I. INTRODUCTION

2 On July 16, 2025, Defendants filed a Motion to Dismiss cases of Plaintiffs
3 who did not file a Plaintiff Fact Sheet (“PFS”) in connection with Pretrial Order
4 (“PTO”) 10. (Doc. 3493). Counsel acknowledges and understands that under PTO
5 10, the court created procedures and deadlines to produce a PFS. Counsel has
6 diligently attempted to comply with the production of the documents required for
7 the discovery obligation of each of the Plaintiffs addressed in this motion. During
8 the course of litigation, a Plaintiff may become unavailable for a variety of reasons.
9 Counsel has utilized extensive efforts to reach each of the clients, predating the
10 filing of Defendant’s motion. (Domer Dec. at ¶ 4). Counsel was able to produce the
11 PFS for six of the missing claimants, dismissed three claimants by joint stipulation,
12 and is continuing extensive efforts to reach the remaining missing claimants.

II. ARGUMENT

14 Counsel has produced PFSs for Jane Roes CL 38, 105, 126, 127, 135, and
15 142, and should therefore be removed from consideration of Defendants' Motion,
16 rendering their inclusion moot as to PTO 10 as a PFS has been produced.
17 Additionally, Jane Roes CL 103, 131, and 152, were dismissed by joint stipulation
18 and should likewise be removed from Defendants' Motion.

19 As to claimants Jane Roe CL 36 and Jane Roe CL 37, through our efforts,
20 Counsel was able to determine that they were deceased. We were therefore unable
21 to comply with PTO 10 and began trying to reach claimants' next of kin. Despite
22 our efforts to date, we have not been able to speak with them about this case and
23 whether to proceed. These claims may require additional time than proposed by
24 Uber Counsel to reach and have these discussions with the next of kin.

III. CONCLUSION

26 For the foregoing reasons, Plaintiffs Jane Roes CL 38, 103, 105, 126, 127,
27 131, 135, 142, and 152 respectfully request that their claims be removed from

1 Defendants' Motion to Dismiss as either having fulfilled their obligation under
2 PTO 10 to submit a PFS, or their case has already been dismissed.
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6 Dated: July 30, 2025

CUTTER LAW P.C.

7 By: /s/ Jennifer S. Domer

8 Jennifer S. Domer (SBN 305822)
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14 *Attorneys for ROE CL Plaintiffs*

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that, on July 30, 2025, I electronically filed the following
3 with the Clerk of the Court using the CM/ECF system, which will send notification
4 of such filing via electronic mail to all counsel of record as maintained in the
5 CM/ECF electronic system.

6

7 Dated: July 30, 2025

8 CUTTER LAW P.C.

9 By: /s/ Jennifer S. Domer

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